

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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In re	:	Chapter 9
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CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	
-----X	:	

**THE DETROIT POLICE COMMAND OFFICERS  
ASSOCIATION’S LIST OF FACT WITNESSES RELATED TO  
THE PROPOSED PLAN FOR THE ADJUSTMENT OF DEBTS**

Detroit Police Command Officers Association (hereinafter “DPCOA”) by its attorneys, Erman, Teicher, Zucker & Freedman, P.C., and Sachs Waldman, PC, and in accordance with this Court’s Fourth Amended order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor’s Plan of Adjustment [Docket No. 4202] (the “Scheduling Order”), hereby submits its list of fact witnesses and identifies the subject that each witness will address:

1. The DPCOA identifies the following individuals, exclusive of those to be offered for rebuttal purposes, as fact witnesses that it may call at the hearing on the proposed plan for the adjustment of the City’s debts (the “Plan”)

a. Captain Aric Tosqui, President DPCOA

Captain Tosqui will testify regarding whether the proposed treatment of the DPCOA's pension claims under the Plan is fair and equitable and feasible and the possible public safety issues related to the City's ability to provide essential police services to the City.

b. Deputy Chief Steven Dolunt, former president DPCOA

Deputy Chief Dolunt will testify regarding whether the proposed treatment of the DPCOA's pension claims under the Plan is fair and equitable and feasible and the possible public safety issues related to the City's ability to provide essential police services to the City.

2. The DPCOA reserves the right to call and cross-examine any witnesses listed by the City, the Retirement Systems, the Retiree Committee, the DPOA, the DPLSA, the DFFA and/or any other objecting party.

3. The DPCOA reserves the right to supplement the testimony topics associated with each witness referenced above, and reserves the right to supplement its list of fact witnesses as may be necessary.

[signatures on next page]

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By: /s/ Barbara A. Patek

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Dated: May 12, 2014

F:\CHAP 9\DETROIT\Plan of Adjustment\discovery materials\DPCOA Witness list.docx

## **CERTIFICATE OF SERVICE**

The undersigned certifies that on May 12, 2014 the Detroit Police Command Officers Association's List of Fact Witnesses Related to the Proposed Plan for the Adjustment of Debts was electronically filed with the Clerk of the Court for the United States Bankruptcy Court, Eastern District of Michigan, Southern Division using the CM/ECF System, which will send notification of such filing to the Debtor and to all attorneys and parties of record registered electronically.

*/s/ Barbara A. Patek*

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Dated: May 12, 2014